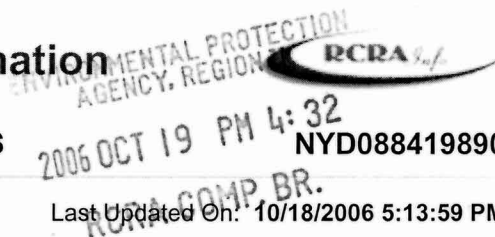




Site ID Form Confirmation


NIACET CORP
NIAGARA FALLS

 Last Updated By: **OZX**

Last Updated On: 10/18/2006 5:13:59 PM

The following information was processed:

General Information

Seq	Source	Received Date	Non-notifier	Extract Flag	Acknowledgement Flag	Number of Employees
2	I	8/28/2006		X		0

2. Site ID

EPA ID	Activity Location	Second ID
NYD088419890	NY	

3. Site Name

NIACET CORP

4. Site Location (Physical address not P.O. Box or Route)

Number	Street1	Street2	City	State	Zip code	County	State District
400	47TH ST		NIAGARA FALLS	NY	14304	NIAGARA	NYSDEC R9

5. Site Land Type

P

6. North American Industry Classification System(NAIC) Codes

NAIC 1

325411 - Medicinal and Botanical Manufacturing

NAIC 2

335991 - Carbon and Graphite Product Manufacturing

NAIC 3

NAIC 4

7. Site Mailing address

Number	Street1	Street2	City	State	Zip code	Country
	PO BOX 8361		SOUTH CHARLESTON	WV	25303	US

8. Site Contact Person (Person to be contacted regarding waste activities at site)

First Name	Middle Initial	Last Name	Phone Number	Phone Ext	Email Address
TIMOTHY	A	KING	3047473763		

8a. Site Contact Address

Number	Street1/P.O. Box	Street2/P.O. Box	City	State	Zip code	Country
	PO BOX 8361		SOUTH CHARLESTON	WV	25303	US

9. Legal Owner/Operator

Seq	Indicator	Name	Type	Date Became Current	Date Ended Current	Street No.	Street1 or P.O. Box	Street2 or P.O. Box	City	State	Country	Zip code	Phone Number	Dun Brads Num
-----	-----------	------	------	---------------------	--------------------	------------	---------------------	---------------------	------	-------	---------	----------	--------------	---------------

10. Type of Federal Regulated Waste Activity**A. Hazardous Waste Activity**

Federal Gen Status	Importer of Haz Waste	Mixed Waste Generator	State Gen Status	Transporter	TSD	Recycler	On-site Burner Exempt	Furnace Exempt	Underground Injection
2	U	U	9				U	U	

B. Universal Waste Activity

Activity	Generated	Accumulated
----------	-----------	-------------

Destination Facility for Universal Waste	N
--	---

C. Used Oil Activities

Used Oil Transporter	Used Oil Transfer Fac	Used Oil Processor	Used Oil Re-refiner	Off Spec Burner	Marketer Who Directs	Marketer Who Claims

D. State Activities**10.1 Latitude/Longitude Information**

Latitude Measure	Longitude Measure	Geometric Type Code	Reference Point Code	Source Map Scale Numbers	Horizontal Accuracy Measure	Horizontal Collection Method	Horizontal Reference Datum
------------------	-------------------	---------------------	----------------------	--------------------------	-----------------------------	------------------------------	----------------------------

0	0			0			
---	---	--	--	---	--	--	--

11. Description of Hazardous Wastes

Type D	Type F	Type K	Type P	Type U	Type X
D009					

12. Comments

ADDRESS VERIFIED; as per nysdec inspection

13. Certification

Seq	Title	First Name	Middle Initial	Last Name	Date
1	NYSDEC INSPECTOR	BRUCE	W	KNAPP	8/28/2006

If you do not have a pop-up blocker on, Universe Calculations have been successfully calculated for **NYD088419890**.
Please click [Continue](#) to see the results.
Otherwise, click [here](#) to run Universe Calculations.

URL: /Handler2/Hand_Siteid_rtn.asp

WJH
01/17/00



RCRAInfo NOTIFICATION DATA DISCREPANCY FORM

Information from RCRAInfo

Changed Information ("E" record only)

Facility Name: <u>UNION CARBIDE</u>	Facility Name: <u>NIACET CORP.</u>
RCRA ID Number: <u>NYD088419890</u>	RCRA ID Number: _____
Facility Address: <u>400 4TH STREET</u>	Facility Address: _____
City: <u>NIAGARA FALLS</u> ST: <u>NY</u> ZIP: <u>14304</u>	City: _____ ST: _____ ZIP: _____
Mailing Address: _____	Mailing Address: _____
City: _____ ST: _____ ZIP: _____	City: _____ ST: _____ ZIP: _____
Facility Contact: _____ Phone: _____ - _____ - _____	Facility Contact: _____ Phone: _____ - _____ - _____
Owner/Operator: _____	Owner/Operator: _____
SIC Code(s): _____	SIC Code(s): _____
Waste Codes: _____	Waste Codes: _____
Generator Status (LQG/SQG): _____	Generator Status (LQG/SQG): _____
Other: _____	Other: _____

RCRAInfo Data Entry Staff will enter all Notification Data changes provided.

Non-LQG/SQG Generator Status Code (Circle Only One Number)

- | | | | |
|---|---|----|---|
| 1 | Conditionally Exempt Small Quantity Generator (CESQG) | 6 | No longer generates hazardous waste - still in business |
| 2 | Definitionally Excluded Waste | 7 | No longer generate hazardous waste - out of business |
| 3 | Delisted Waste | 8 | Never generated hazardous waste |
| 4 | One-time Hazardous Waste Generator | 9 | RCRA ID number used to transport non-hazardous waste |
| 5 | Periodic Hazardous Waste Generator | 10 | Regulated under other RCRA ID number(s): _____ |

Contact Name: BRUCE W. KNAPP **Phone:** 518-402-8629 **Authorized by:** Bruce W. Knapp
Effective Change Date: _____ **(Check: _____ Federal or _____ State RCRA Manager)**



Region 2

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

11/12/2004

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER:	NYD088419890
INSTALLATION NAME:	UNION CARBIDE CORP
INSTALLATION ADDRESS :	400 47TH ST NIAGARA FALLS, NY 14304
MAILING ADDRESS :	PO BOX 8361 SOUTH CHARLESTON, WV 25303

EPA Form 8700-12AB (4-80)

**USEPA - REGION 2
RCRA Programs Branch
290 Broadway, 22nd Floor
New York, NY 10007-1866**

**ATTN: RCRA NOTIFICATIONS
Tel : (212) 637-4106
Fax: (212) 637-3056**

**TO: UNION CARBIDE CORP
or Current Occupant
ATTN: TIMOTHY KING
PO BOX 8361
SOUTH CHARLESTON, WV 25303**

OMB#: 2050-0028 Expires 1/31/2006

SEND COMPLETED**FORM TO:**The Appropriate State or
EPA Regional Office.

United States Environmental Protection Agency

RCRA SUBTITLE C SITE IDENTIFICATION FORM

2004 NOV -9 PM 1:54

RCRA PROGRAMS
BRANCH**1. Reason for
Submittal**
(See instructions
on page 13.)MARK ALL BOX(ES)
THAT APPLY**Reason for Submittal:**

- ☒ To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities)
- ☐ To provide Subsequent Notification of Regulated Waste Activity (to update site identification information)
- ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application
- ☐ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____)
- ☐ As a component of the Hazardous Waste Report

**2. Site EPA ID
Number (page 14)**

EPA ID Number

NYD 088 419 890

**3. Site Name
(page 14)**

Name:

UNION CARBIDE CORPORATION

**4. Site Location
Information
(page 14)**

Street Address: 400 47TH STREET

City, Town, or Village: NIAGARA FALLS

State: NEW YORK

County Name: NIAGARA COUNTY

Zip Code: 14304

**5. Site Land Type
(page 14)**Site Land Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other**6. North American
Industry
Classification
System (NAICS)
Code(s) for the Site
(page 14)**A. SIC - 2869
NAICS - 325199B. ORGANIC CHEMICAL MFG.
(FOOD PRESERVATIVES)

C.

D.

**7. Site Mailing
Address
(page 15)**

Street or P. O. Box: P.O. BOX 8361

City, Town, or Village: SOUTH CHARLESTON

State: WV

Country: USA

Zip Code: 25303

**8. Site Contact
Person
(page 15)**

First Name: TIMOTHY

MI: A

Last Name: KING

Phone Number: (304) 747-3763 Extension:

Email address: kingta@dow.com

**9. Operator and
Legal Owner
of the Site
(pages 15 and 16)**A. Name of Site's Operator:
Union Carbide Corp.Date Became Operator (mm/dd/yyyy):
1951Operator Type: ☐ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ OtherB. Name of Site's Legal Owner:
UNION CARBIDE CORP.Date Became Owner (mm/dd/yyyy):
1951Owner Type: ☐ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

EPA ID NO:

OMB#: 2050-0028 Expires 1/31/2006

9. Legal Owner (Continued) Address	Street or P. O. Box: P.O. BOX 8361	
	City, Town, or Village: SOUTH CHARLESTON	
	State: WV	
	Country: USA	Zip Code: 25303

10. Type of Regulated Waste Activity

Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 16 to 20.)

A. Hazardous Waste Activities

Complete all parts for 1 through 6.

☒ ☐ 1. Generator of Hazardous Waste

If "Yes", choose only one of the following - a, b, or c.

☐ a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.)
of non-acute hazardous waste; or☒ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.)
of non-acute hazardous waste; or☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo.)
of non-acute hazardous waste

In addition, indicate other generator activities.

☐ ☒ d. United States Importer of Hazardous Waste☐ ☒ e. Mixed Waste (hazardous and radioactive) Generator☐ ☒ 2. Transporter of Hazardous Waste☐ ☒ 3. Treater, Storer, or Disposer of
Hazardous Waste (at your site) Note:
A hazardous waste permit is required for
this activity.☐ ☒ 4. Recycler of Hazardous Waste (at your
site)☐ ☒ 5. Exempt Boiler and/or Industrial
Furnace

If "Yes", mark each that applies.

☐ a. Small Quantity On-site Burner
Exemption☐ b. Smelting, Melting, and Refining
Furnace Exemption☐ ☒ 6. Underground Injection Control

B. Universal Waste Activities

☐ ☒ 1. Large Quantity Handler of Universal Waste (accumulate
5,000 kg or more) [refer to your State regulations to
determine what is regulated]. Indicate types of universal
waste generated and/or accumulated at your site. If "Yes",
mark all boxes that apply:

	Generate	Accumulate
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>	<input type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>

☐ ☒ 2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

Mark all boxes that apply.

☐ ☒ 1. Used Oil Transporter

If "Yes", mark each that applies.

☐ a. Transporter☐ b. Transfer Facility☐ ☒ 2. Used Oil Processor and/or Re-refiner

If "Yes", mark each that applies.

☐ a. Processor☐ b. Re-refiner☐ ☒ 3. Off-Specification Used Oil Burner☐ ☒ 4. Used Oil Fuel Marketer

If "Yes", mark each that applies.

☐ a. Marketer Who Directs Shipment of
Off-Specification Used Oil to
Off-Specification Used Oil Burner☐ b. Marketer Who First Claims the
Used Oil Meets the Specifications

OMB#: 2050-0028 Expires 1/31/2006

11. Description of Hazardous Wastes (See instructions on page 20.)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.

12. Comments (See instructions on page 20.)

SITE INVESTIGATION DERIVED WASTES (IDW)

- ONE TIME EVENT TO DISPOSE OF MERCURY CONTAMINATED SOIL, WATER AND PPE? GENERATED DURING SITE INVESTIGATION ACTIVITIES.

13. **Certification.** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (See instructions on page 20.)

EPA Form 8700-12 (Revised 1/2004)

RCRA Site Detail

Report run on: November 9, 2004 - 2:39 PM

Page 5

NYD088419890 NIACET CORP

Continued...

325188 All Other Basic Inorganic Chemical Manufacturing
325613 Surface Active Agent Manufacturing

Notes: Update 10/03 to ensure Leg_Dist is associated with correct Counties

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility: Unknown

Used Oil Activities

Other Hazardous Waste Generator Activities

Used Oil Transporter Activity

Off-Specification Used Oil Burner:

Unknown

Importer Activity: Unknown
Mixed Waste Generator: Unknown

Transporter: Unknown
Transfer Facility: Unknown

Used Oil Fuel Marketer Activity

Transporter Activity: Unknown

Used Oil Processor and/or
Re-refiner Activity

Marketer who directs shipment
off-specification used oil to
off-specification used oil burner:

Unknown

TSD Activity: No

Recycler Activity: Unknown

Processor: Unknown
Refiner: Unknown

Marketer who first claims the used
oil meets the specifications:

Unknown

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown
Smelting, melting, Refining Furnace
Exemption: Unknown

Underground
Injection Control: Unknown

Destination Facility for
Universal Waste:

Unknown

Biennial Report Information

Total Quantity Reported (Tons): Generated: 4 Managed: 0 Shipped: 4 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
-----------	---------	---------------------------	---------	----------------------------

TWO TRANSFORMERS CONTAIN OIL THAT HAD PCB'S WERE REMOVED FRO

1 0

1 H039 - OTHER RECOVERY

State Waste Codes: NY-B001

Activity Location: NY	Source Type: Notification	Seq. Number: 1	Receive Date: 15 AUG 1980
-----------------------	---------------------------	----------------	---------------------------

Other/Previous Site Name: NIACET CORP

Location 400 47TH ST
Address: NIAGARA FALLS, NY 14304-2102

Mailing PO BOX 1034 400 47TH ST
Address: NIAGARA FALLS, NY 14302

Contact Person JOHN ROTROCK 400 47TH ST
For Source (716) 285-1479 NIAGARA FALLS, NY 14302
Information

Owner (current) NOT REQUIRED
NIACET CORP NOT REQUIRED, WY 99999
From: To:

Type: Private
Phone: (212) 555-1212

Land Type: Bad code - Non Notifier: No Commercial Availability: Other - U Tsd Date:
Accessibility: No. Employees: State District: NYSDEC R9

Notes: Update 10/03 to ensure Leg_Dist is associated with correct Counties

RCRA Site Detail

Report run on: November 9, 2004 - 2:39 PM

Page 6

NYD088419890 NIACET CORP

Continued...

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility: Unknown

Other Hazardous Waste Generator Activities

Importer Activity: Unknown
Mixed Waste Generator: Unknown

Transporter Activity: No
TSD Activity: No
Recycler Activity: No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown
Smelting, melting, Refining Furnace Exemption: Unknown

Used Oil Activities

Used Oil Transporter Activity Off-Specification Used Oil Burner: No

Transporter: No
Transfer Facility: No

Used Oil Fuel Marketer Activity

Marketer who directs shipment
off-specification used oil to
off-specification used oil burner: No

Used Oil Processor and/or
Re-refiner Activity

Processor: No
Refiner: No

Marketer who first claims the used
oil meets the specifications: No

Underground
Injection Control: No

Destination Facility for
Universal Waste:

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D000

*** End of Report ***

RCRA Site Detail

Report run on: November 9, 2004 - 2:39 PM

Page 3

NYD088419890 NIACET CORP

EPA Region 02 Extract Flag: X Facility Identifier: County: NIAGARA

Basic Notes: EXTRACT_FLAG UPDATED OCT 2003 VIA SQL

Universes	Full Enforcement: ----	Subj CA:	Perm Prgrs: ----	Op Pmt GPRA:
Generator: N	Operating TSDF: ----	Subj CA TSD 3004:	Perm Wrkld: ----	PClos GPRA:
Transporter:	BOYSNC:	Subj CA TSD Discr:	Clos Wrkld: ----	CA GPRA:
	SNC:	Subj CA Non-TSD:	Pclos Wrkld: ----	CA HE EI:
	Annual BOY Enf:	CA Wrkld:	Controls in Place: No	CA GW EI:

Activity Location: NY Source Type: Biennial Report Seq. Number: 2 Receive Date: 01 JAN 2001 Report Cycle: 1999

Other/Previous Site Name: NIACET CORPORATION

Location 400-47TH STREET
Address: NIAGARA FALLS, NY 14304

Mailing 400-47TH STREET
Address: NIAGARA FALLS, NY 14304

Contact Person SALVATORE J D ANGELO
For Source (716) 285-1474
Information

Land Type: Bad code - U Non Notifier: No Commercial Availability: Other - U Tsd Date:

Accessibility: No. Employees: State District: NYSDEC R9

NAICS Codes: 32511 Petrochemical Manufacturing

Notes: Update 10/03 to ensure Leg_Dist is associated with correct Counties

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility: Unknown

Used Oil Activities

Other Hazardous Waste Generator Activities

Importer Activity: Unknown
Mixed Waste Generator: Unknown

Transporter Activity: Unknown
TSD Activity: No
Recycler Activity: Unknown

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown
Smelting, melting, Refining Furnace Exemption: Unknown

Used Oil Transporter Activity Off-Specification Used Oil Burner: Unknown

Transporter: Unknown
Transfer Facility: Unknown
Used Oil Fuel Marketer Activity

Used Oil Processor and/or Re-refiner Activity
Marketer who directs shipment off-specification used oil to off-specification used oil burner: Unknown

Processor: Unknown
Refiner: Unknown
Marketer who first claims the used oil meets the specifications: Unknown

Underground Injection Control: Unknown
Destination Facility for Universal Waste: Unknown

Biennial Report Information

Total Quantity Reported (Tons): Generated: 1 Managed: 0 Shipped: 1 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
-----------	---------	---------------------------	---------	----------------------------

WASTE TOXIC, LIQUIDS, ORGANIC, N.O.S. (P-DIMETHYLAMINAZO BENZENE, POTASSIUM FERRICYANIDE) 6.1, UN2810 II DOT-E 9723 FROMLAB CLEANOUT

0 0

0 H132 - LANDFILL OR SURFACE IMPOUNDMENT

EPA Waste Codes: P030

RQ WASTE FLAMMABLE LIQUIDS, N.O.S. 3, UN 1993, I FROM LABORATORY CLEANOUT

0 0

0 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE

EPA Waste Codes: U108

RQ WASTE TOXIC LIQUIDS, CORROSIVE, ORGANIC, N.O.S. (PHENYLAMINE, ARSENIUS OXIDE) 6.1 UN2927, II (D004) (FROM LAB CLEANOUT)

0 0

0 H132 - LANDFILL OR SURFACE IMPOUNDMENT

EPA Waste Codes: P077

WASTE CORROSIVE LIQUID, FLAMMABLE, N.O.S. UN 3264, UN2920, I, DOT-E 9723 (FROM LABORATORY CLEANOUT)

0 0

0 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE

EPA Waste Codes: D002

RCRA Site Detail

Report run on: November 9, 2004 - 2:39 PM

Page 4

NYD088419890 NIACET CORP

Continued...

Top 10 GM Forms Summary - continued (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
RQ HAZARDOUS WASTE, SOLID, N.O.S. 9, NA3077, III (ASBESTOS)(FROM LABORATORY CLEANOUT)				
0	0			0 H132 - LANDFILL OR SURFACE IMPOUNDMENT
EPA Waste Codes: U222				
WASTE LAB CHEMICALS, REACTIVE D003, N.O.S. VARIOUS (FROM LABORATORY CLEANOUT.)				
0	0			0 H132 - LANDFILL OR SURFACE IMPOUNDMENT
EPA Waste Codes: D003				
RQ WASTE MERCURY 8, UN2809, III DOT-E 11153 (D009) (FROM LABORATORY CLEANOUT)				
0	0			0 H132 - LANDFILL OR SURFACE IMPOUNDMENT
EPA Waste Codes: D009				
RQ WASTE TOXIC SOLID, INORGANIC, N.O.S. (MERCURIC CYANIDE, MERCURIC ACETATE) 6.1, UN 3288, II DOT-E 9723 (D009) LAB CLEANOUT				
0	0			0 H132 - LANDFILL OR SURFACE IMPOUNDMENT
EPA Waste Codes: P030				

Activity Location: NY Source Type: Implementer Seq. Number: 1 Receive Date: 08 JUL 1999

Other/Previous Site Name: NIACET CORP

Location 400 47TH ST
Address: NIAGARA FALLS, NY 14304-2102

Mailing PO BOX 1034 400 47TH ST
Address: NIAGARA FALLS, NY 14302

Land Type: Bad code - Non Notifier: No Commercial Availability: Other - U Tsd Date:
Accessibility: No. Employees: State District: NYSDEC R9

NAICS Codes: 325411 Medicinal and Botanical Manufacturing
335991 Carbon and Graphite Product Manufacturing

Notes: Update 10/03 to ensure Leg_Dist is associated with correct Counties

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Not a Generator; State: HQ-N Not a Generator

Transfer Facility: Unknown

Used Oil Activities

Other Hazardous Waste Generator Activities

Importer Activity: Unknown
Mixed Waste Generator: Unknown

Transporter Activity: No
TSD Activity: No
Recycler Activity: No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown
Smelting, melting, Refining Furnace Exemption: Unknown

Used Oil Transporter Activity
Transporter: No
Transfer Facility: No
Used Oil Processor and/or Re-refiner Activity
Processor: No
Refiner: No
Off-Specification Used Oil Burner: No
Used Oil Fuel Marketer Activity
Marketer who directs shipment off-specification used oil to off-specification used oil burner: No
Marketer who first claims the used oil meets the specifications: No

Underground Injection Control: No
Destination Facility for Universal Waste:

Activity Location: NY Source Type: Biennial Report Seq. Number: 1 Receive Date: 28 FEB 1992 Report Cycle: 1991

Other/Previous Site Name: NIACET CORP

Location 400 47TH ST
Address: NIAGARA FALLS, NY 14302

Mailing PO BOX 258 - 400 47TH ST
Address: NIAGARA FALLS, NY 14304

Contact Person KELLY A BRANNEN
For Source (716) 285-1474 ext. 9999
Information

Land Type: Bad code - U Non Notifier: No Commercial Availability: Other - U Tsd Date:
Accessibility: No. Employees: State District: NYSDEC R9

NAICS Codes: 32511 Petrochemical Manufacturing



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

•NYD088419890

INSTALLATION ADDRESS

NIACET CORPORATION
P.O. BOX 1034, 400-47TH STREET
NIAGARA FALLS NY 14302

400-47TH STREET
NIAGARA FALLS NY 14302

I.D. - FOR OFFICIAL USE ONLY

S	W	N	Y	D	0	8	8	4	1	9	8	9	0	2	1
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)
X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (type or print)

DATE SIGNED

John A. Rothrock

John A. Rothrock, Plant Manager

8/12/80

EPA Form 8700-12 (6-80) REVERSE



RECEIVED
MAR 9 1981
ENVIRONMENTAL PROTECTION
AGENCY
NEW YORK, N.Y. 10001

NOT UNION
CARBIDE
SOLD OUT

February 19, 1981

Permits Administration Branch
U.S. ENVIRONMENTAL PROTECTION BRANCH
Region II
26 Federal Plaza
New York, N.Y. 10278

Attention: Julio Morales-Sanchez
Enforcement Division

Dear Mr. Morales-Sanchez:

This is in response to your letter of February 9 to Union Carbide Corporation, Niacet Division. Union Carbide sold this plant in June 1978 and it is now known as the Niacet Corporation.

Niacet Corporation has notified the EPA of our hazardous waste activity and our EPA identification number is NYD088419890.

Enclosed is a copy of your letter to insure the removal of the old UCC name and address from your files. Please note the correct address on our letterhead.

Yours very truly,

NIACET CORPORATION

J. A. Rothrock
Plant Manager

JAR:jm
enclosure

1/8



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

26 FEDERAL PLAZA

NEW YORK, NEW YORK 10278

February 9, 1981

MAR 9 11 50 AM '81
ENVIRONMENTAL PROTECTION
AGENCY
NEW YORK, N.Y. 10007

PAB
MAR 9 11 51 AM '81

ENVIRONMENTAL PROTECTION
AGENCY
NEW YORK, N.Y. 10007

NYD000523852

UNION CARBIDE CORP NIACET DIV

PO BOX 68
NIAGARA FALLS

NY 14302

Dear Sir:

The United States Environmental Protection Agency (EPA) regulates the handling of hazardous wastes under the Resource Conservation and Recovery Act (RCRA) 42 U.S.C. §6901 et seq. Under Section 3010 of RCRA, 42 U.S.C. §6930, parties handling certain quantities of hazardous wastes (these wastes are characterized and listed in regulations which were published in the Federal Register of May 19, 1980, 45 FR 33084 et seq. and July 16, 1980, 45 FR 47832 et seq.) are required to notify EPA of their activities. Facilities handling wastes defined by the May 19, 1980 regulations were required to notify by August 18, 1980. Facilities handling wastes defined by the July 16, 1980 regulations were required to notify by October 14, 1980. We have not yet received a notification from you or your company.

Section 3007 of RCRA, 42 U.S.C. §6927, allows EPA to request certain information of parties who handle hazardous wastes. Based upon information available to this Agency, we believe that you or your company handles such hazardous wastes. Therefore, in order to determine the extent of your hazardous waste activity, and to determine whether you should have notified EPA pursuant to §3010, we require that you answer the questions posed below. Your reply should be completed and signed by a responsible official of your firm and returned to us within 21 days of the date of this letter. If you have already notified EPA of your hazardous waste activity, please respond, indicating your prior notification and listing your EPA Identification Number, if available.

Please answer the following questions:

- 1) Do you handle any "hazardous wastes," as this term is defined in RCRA and the regulations promulgated under RCRA (regulations published in the Federal Register on May 19, 1980; July 16, 1980; October 30, 1980; November 12, 1980; November 17, 1980 and November 25, 1980)?
- 2) If you do handle such wastes, what is the greatest quantity of hazardous wastes that you handle in any one month?
- 3) If you do handle any hazardous wastes, please identify them by type, characteristics, components, or by the process that produces these wastes.
- 4) How do you handle these wastes (i.e. do you generate, transport, treat, store or dispose of them)?

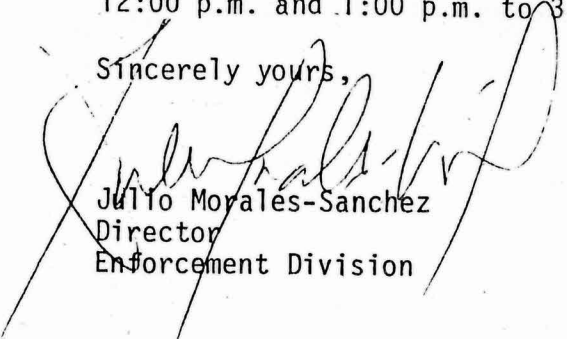
Your response to this letter should be sent to:

Permits Administration Branch
U.S. Environmental Protection Branch
Region II
26 Federal Plaza
New York, New York 10278

Your failure to respond to this letter in a timely manner may subject you to the initiation of enforcement action under Section 3008 of RCRA, 42 U.S.C §6928. Such enforcement action may include the assessment of substantial penalties for continued non-compliance.

Your response to this letter does not constitute notification under RCRA. Such notification must be made by filling out EPA Form 8700-12. If you need this form, please request it with your response. If you have any questions on the contents of this letter or desire a notification package, please contact the EPA Permits Administration Branch of 26 Federal Plaza, New York, New York 10278. Telephone calls to (212) 264-7306 may be made between the hours of 10:00 a.m. to 12:00 p.m. and 1:00 p.m. to 3:00 p.m., Monday through Friday.

Sincerely yours,



Julio Morales-Sanchez
Director
Enforcement Division

NYD088419890



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

90 JUL 13 PM 2:14

JUL 11 1990

BRANCH

Mr. Rick W. Kennedy
Hodgson, Russ, Andrews, Woods & Goodyear
Attorneys at Law
1800 One M & T Plaza
Buffalo, N.Y. 14203-2391

Dear Mr. Kennedy:

On March 13, 1990, my office responded to your request, on behalf of your client Niacet Corporation, for a regulatory interpretation of the potential effect of the proposed Toxicity Characteristic Leaching Procedure (TCLP) Rule on your clients operations which produce a phenol-containing wastestream. Since that time, the TCLP Final Rule has been signed by Mr. William K. Reilly, Administrator of the Environmental Protection Agency (EPA), and has been published in the Federal Register along with its implementation schedule. My office has received your letter dated May 7, 1990 which correctly states that phenol has not been included as a regulated substance under the TCLP Final Rule, effectively eliminating any immediate concern for your client. However, in your letter you also recognized that phenol could become regulated under the TCLP Final Rule at some later date. With this in mind, several of the statements made in your May 7, 1990 letter need to be addressed.

You have maintained that Niacet's wastestream is not subject to regulation because the TCLP is designed to gauge the leachability of toxic substances from a waste solid. As explained to you by my office in our response dated March 13, 1990, the mechanism leading to exceedance of a regulatory level has no bearing on the regulatory status of a waste. Once the regulatory level for a TC waste is surpassed, that substance is a characteristic hazardous waste. For example, if a phenol-containing solid waste was disposed of in a surface impoundment and leached phenol into the groundwater in sufficient quantities so that the concentration of phenol in the groundwater exceeded TC regulatory levels, that groundwater would become a regulated characteristic hazardous waste and would be handled as such upon extraction for as long as the phenol concentration in the groundwater exceeded the TC regulatory level.

In your letter you have stated that, "since Niacet's wastewater is treated and discharged by a municipal POTW in compliance with the Clean Water Act (CWA) and associated State authority, the essential predicate for the TCLP rule is absent". In writing the TCLP Final Rule, EPA recognized that confusion could be created

by the apparent conflict between wastewaters which meet applicable standards under the CWA but are hazardous under RCRA. However, since CWA guidelines are established to "...require application of the best available technology economically achievable..." to limit effluent concentrations to meet applicable water standards, and RCRA must identify wastes which are a threat to human health and the environment, the criteria for establishing regulatory levels and the goals of the programs are different. The Agency's position is that wastewaters exceeding TCLP regulatory levels pose a threat to human health and the environment. Therefore, facilities that generate and/or treat wastewaters exhibiting the TC will be required to comply with all applicable regulations under RCRA and CWA. The applicable regulations under RCRA with which Niacet and the POTW would have to maintain compliance, should phenol become a TC regulated substance, were detailed to you in my March 13, 1990 response.

In regard to your statement that RCRA regulations contain an exclusion for industrial wastewater point source discharges to a POTW, 40 C.F.R. §261.4(a)(2) states that "industrial wastewater discharges that are point source discharges subject to regulation under section 402 of the Clean Water Act, as amended" are excluded from regulation. The comment below this section further states that "this exclusion applies only to the actual point source discharge. It does not exclude industrial wastewaters while they are being collected, stored or treated before discharge, nor does it exclude sludges that are generated by industrial wastewater treatment".

I appreciate your interest and concern on behalf of your client. However, the interpretation and intent of these regulations are clear and I must repeat that, should phenol become regulated under the TCLP Final Rule, your client and the POTW would be subject to the regulations cited in our March 13, 1990 reply.

If you have any further questions concerning this matter, please direct them to Mr. Philip Flax of my staff at (212)264-5974.

Sincerely,

ORIGINAL SIGNED BY WILLIAM S. BAKER *for*

Conrad Simon, Director
Air and Waste Management Division

bcc: George Meyer, 2AWM-HWC
John Gorman, 2AWM-HWC
Philip Flax, 2AWM-HWC
Laura Livingston, 2OPM-PAB

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: July 27, 2016 - 12:09 PM

Version 5.0

User Selection Criteria

Location:	New York, all activities	Activity Location:	None Chosen
Handler ID:	NYD088419890	Group of IDs:	None Chosen
Handler Name:			
Handler Universe:	All Facilities Regardless of Universe		
Determined Date Range:	From: 10/01/1980 To: 07/27/2016		
Location County Code:	None Chosen	Evaluation Type:	
Location City:		Focus Area:	
Location Zip Code:		Violation Type:	
State District:	None Chosen	Display Code Descrip.:	Yes
Sort Order:	Region, State, Handler Name	Display Universes:	Yes

Results

Data meeting the criteria you selected follows.

Total Pages:5 Total Handlers:1

Report Description

This report presents available information from the Resource Conservation and Recovery Act Information System (RCRAInfo) about compliance evaluations, violations, and enforcement actions meeting the criteria supplied by the user. Evaluations showing no violations does not always indicate that no violations were determined. Violation without enforcement actions does not always mean no enforcement action will be issued. In order to avoid releasing enforcement sensitive information to the public the following information is not shown on the report: pending civil / judicial referrals, criminal actions and referrals, and State to EPA referrals; all other enforcement actions are released.

Report Information

Name: cme_foia.rdf
Developed by: EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed: June 2006
Last Updated: May 2012
Contact: rcrainfo.help@epa.gov
Tables Used: cmecomp3, ccitation3, hreport_univ5, lu_citation, lu_state, hid_groups
Libraries: none

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: July 27, 2016 - 12:09 PM

Page 2

NIACET CORP

County Name / Code: NIAGARA / NY063

NYD088419890

Location: 400 47TH ST; NIAGARA FALLS, NY 14304

REGION 02

Mailing: PO BOX 8361; SOUTH CHARLESTON, WV 25303

Activity Location: NY	State District: NYSDEC R9	Accessibility:	Non-Notifier:	Extract Flag: Y	Active Site: Y
Generator: SQG	Transporter: N	Operating TSDF: -----	IC In Place: N	El Indicator (HE / GW): N / N	
Short-Term Gen: N	Transfer Facility: N	Offsite Receiver: N	HSM: N	Subpart K: -----	
Full Enforcement: -----	Converter: -----	State Unaddressed SNC: N	EPA Unaddressed SNC: N		
CA Wrkld: N	State TSDF: -----	State Addressed SNC: N	EPA Addressed SNC: N		
Active State Gen: N		State SNC w/Comp Sched: N	EPA SNC w/Comp Sched: N		

Violation:	Activity Location: NY	Type: 262.A	Determined Date: 04/18/1994	Determined by Agency: State	Responsible Agency: State
	Scheduled Compliance Date: 05/18/1994		Actual Compliance Date: 06/01/1994	RTC Qualifier: OBSERVED	Sequence Number: 3
CEI Evaluation	03/29/1994	Activity Location: NY	By: State	Identifier: 000	Person: NYRFR
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:
Enforcement:	Activity Location: NY	Type: 120	Action Date: 04/18/1994	Identifier: 000	
Docket:		Agency: State	Responsible Person: NYRFR	Branch: R9	
CA Component: N		Disposition Status:	Appeal Initiated:	Appeal Resolved:	

Violation:	Activity Location: NY	Type: 262.A	Determined Date: 11/16/1989	Determined by Agency: State	Responsible Agency: State
	Scheduled Compliance Date: 01/18/1990		Actual Compliance Date: 01/29/1990	RTC Qualifier: OBSERVED	Sequence Number: 2
CEI Evaluation	11/16/1989	Activity Location: NY	By: State	Identifier: 002	Person: NYDEC
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:
Enforcement:	Activity Location: NY	Type: 120	Action Date: 12/18/1989	Identifier: 002	
Docket:		Agency: State	Responsible Person: NYDEC	Branch:	
CA Component: N		Disposition Status:	Appeal Initiated:	Appeal Resolved:	

Violation:	Activity Location: NY	Type: 262.A	Determined Date: 10/06/1987	Determined by Agency: State	Responsible Agency: State
	Scheduled Compliance Date: 04/11/1988		Actual Compliance Date: 04/25/1988	RTC Qualifier: OBSERVED	Sequence Number: 1
CEI Evaluation	10/06/1987	Activity Location: NY	By: State	Identifier: 001	Person: NYDEC
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:
Enforcement:	Activity Location: NY	Type: 120	Action Date: 11/23/1987	Identifier: 001	
Docket:		Agency: State	Responsible Person: NYDEC	Branch:	
CA Component: N		Disposition Status:	Appeal Initiated:	Appeal Resolved:	

Evaluations With No Violations:

CEI Evaluation	08/06/2014	Activity Location: NY	By: State	Identifier: 001	Person: NYNSL	Branch: R9	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 08/06/2014		Focus Area:

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: July 27, 2016 - 12:09 PM

Page 3

NIACET CORP, NYD088419890, NIAGARA FALLS, NY, continued -

CEI Evaluation	04/15/2010	Activity Location: NY	By: State	Identifier: 001	Person: NYTRN	Branch: R9	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 04/15/2010		Focus Area:
CEI Evaluation	05/25/2006	Activity Location: NY	By: State	Identifier: 005	Person: NYNSL	Branch: R9	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 05/25/2006		Focus Area:
CEI Evaluation	09/15/1999	Activity Location: NY	By: State	Identifier: 000	Person: NYBRS	Branch: R9	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
CEI Evaluation	04/17/1997	Activity Location: NY	By: State	Identifier: 000	Person: NYRFR	Branch: R9	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:

Total Number of Handlers: 1

Total Number of Activity Locations: 1

* End of Report *

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: July 27, 2016 - 12:09 PM

Page 4

Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
EI Indicator (HE / GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
Short-Term Gen	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
Transfer Facility	Indicates that the facility transfers hazardous waste.
Offsite Receiver	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID).
HSM	Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
Subpart K	Indicates that the facility has opted into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital; N - Non-profit Research Institute; W - withdrawal from the rule)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
Active State Gen	Indicates that the facility is an Active State Generator. ('Y' indicates that the facility is in this universe).
Converter	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State TSDF	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State Addressed SNC	Indicates that the facility is a State Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: July 27, 2016 - 12:09 PM

Page 5

Description of codes used on the report:

ACCESSIBILITY - indicates the reason why the handler is not accessible for normal RCRA tracking and processing (previously called Bankrupt Indicator):	
Code	Description
B	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
C	indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

NON-NOTIFIER - indicates that the handler has been identified through a source other than Notification and is suspected of conducting RCRA-regulated activities without proper authority:	
Code	Description
E	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
O	indicates that the handler is a former non-notifier.
X	indicates that the handler is a non-notifier.

Violation Type	Description
262.A	GENERATORS - GENERAL

Evaluation Type	Type Description
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE

Enforcement Type	Enforcement Description
120	WRITTEN INFORMAL

* Note: Penalty amount may not reflect all violations cited.

